

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST.

No. 1.

THE UNITED STATES OF AMERICA AND ORS.

Prosecutors,

- AGAINST -

ARAKI, Sadao, AND ORS.

Defendants.

APPLICATION FOR LEAVE TO FILE MOTION.

The

day of June, 1946.

The abovementioned Prosecutors make application to the International Military Tribunal for the Far East for leave to file the motion a copy of which is hereto annexed and for an order for the hearing of such motion in chambers at a date and time to be fixed by the said Tribunal or for such further or other order as to the Tribunal may seem meet on the grounds following:

- (1) That if copies of the whole of every document or book from which excerpts are adduced in evidence by the Prosecution are required to be made and served on the Defendants, considerable delay will be caused in the trial. The reproducing and processing units and the material available in Japan are insufficient to enable such copies to be made promptly, and it will therefore be necessary to send some of the said documents or books to the United States of America for reproduction. In spite of repeated efforts by the Prosecution, it has been found impossible to procure reproducing or processing units and material other than those which are at present available. It is estimated that the Prosecution will use excerpts from 1,000 of such documents or books and that the average number of pages in each complete document or book is 150. If 30 copies are made of each page of each of such books or documents, the total number of pages to be reproduced will be 4,500,000.

/(2) That

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(2) That the Rule as proposed by the Prosecution will, it is respectfully submitted, meet all necessary requirements for a just trial.

(SGD.) CARLISLE HIGGINS

for Chief of Counsel.

TO -

The General Secretary to the International
Military Tribunal for the Far East,

AND TO -

The abovenamed Defendants.